RUBIN. FIORELLA & FRIEDMAN LLP

ATTORNEYS AT LAW

630 THIRD AVENUE, 3RD FLOOR NEW YORK, NEW YORK 10017

TELEPHONE: (212) 953-2381 FACSIMILE: (212) 953-2462

WRITER'S DIRECT DIAL: (212) 447-4620 E-MAIL: bfriedman@rubinfiorella.com

July 13, 2012

MEMO ENDORSED

VIA FAX: (212) 805-7949

Honorable P. Kevin Castel United States Courthouse 500 Pearl Street New York, NY 10007

Re:

Ambert grotel.
Ambert grotel.
Sofflutt Employers Ins. Co. Of Wausau v. Munich Reinsurance America, Inc.

Civil Action No.: 10-CV-3558(PKC)

RENEWED REQUEST FOR PRE-MOTION CONFERENCE

Dear Judge Castel:

Defendant Munich Reinsurance America, Inc., ("Munich Re") respectfully requests permission to submit a reply letter in support of its renewed request for a pre-motion conference in order to proceed with a motion for sanctions. Employers Ins. Co. of Wausau's ("Wausau") letter in opposition to Munich Re's request, filed yesterday, contains misstatements and omits material information. Munich Re wishes to respond only to correct the misstatements and to clarify the record.

Respectfully submitted,

Dine Tues

Bruce M. Friedman

cc:

Geri Horenstein, Esq. Martin Clearwater & Bell Attorneys for Plaintiff Fax: (212) 949-7054

Email: horeng@mcblaw.com